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Attorneys for Plaintiff
NXP B.V.

IN THE UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

NXP B.V.,

Plaintiff,

v.

BROADCOM CORPORATION

Defendant.

Case No. 2:13-cv-00453-MMD-VCF

**DECLARATION OF CHRISTINA M.
FINN IN SUPPORT OF NXP B.V.'S
OPPOSITION TO DEFENDANT
BROADCOM CORPORATION'S
MOTION TO TRANSFER TO THE
NORTHERN DISTRICT OF
CALIFORNIA**

I, Christina M. Finn, declare as follows:

1. I am an attorney at the law firm Bunsow, De Mory, Smith & Allison LLP, and represent plaintiff NXP B.V. ("NXP") in the above-referenced matter. I am a member of the bar of

1 the State of California. Unless otherwise indicated, I have personal knowledge of the facts contained
2 in this declaration, and if called upon to do so, I could and would testify competently thereto.

3 2. Attached as **Exhibit 1** is a true and correct copy of a webpage entitled, "What is the
4 History of NFC? Where did the Technology Come From?" dated December 27, 2011, available at
5 [http:// http://www.askidentive.com/nfc-technology/what-is-the-history-of-nfc](http://www.askidentive.com/nfc-technology/what-is-the-history-of-nfc), last accessed January
6 24, 2014.

7 3. Attached as **Exhibit 2** is a true and correct copy of a press release entitled, "Philips
8 and Sony Announce Strategic Cooperation to Define Next Generation Near Field Radio-Frequency
9 Communications," dated September 5, 2002, available at
10 <http://www.newscenter.philips.com/main/standard/about/news/press/archive/2002/article-2476.wpd>,
11 last accessed January 24, 2014.

12 4. Attached as **Exhibit 3** is a true and correct copy of a press release entitled "NXP
13 Consolidates No. 1 Position in Worldwide ID Market," dated July 29, 2011, available at
14 [http://www.nxp.com/news/press-releases/2011/07/nxp-consolidates-no-1-position-in-worldwide-id-](http://www.nxp.com/news/press-releases/2011/07/nxp-consolidates-no-1-position-in-worldwide-id-market.html)
15 [market.html](http://www.nxp.com/news/press-releases/2011/07/nxp-consolidates-no-1-position-in-worldwide-id-market.html), last accessed on January 24, 2014.

16 5. Attached as **Exhibit 4** is a true and correct copy of document entitled, "Broadcom
17 Corporation Corporate Overview Q3 2013," available at
18 http://www.broadcom.com/docs/company/corporate_overview.pdf, last accessed on January 24,
19 2014.

20 6. Attached as **Exhibit 5** is a true and correct copy of a webpage entitled, "Broadcom
21 Upcoming Events," available at <http://www.broadcom.com/company/events/>, last accessed January
22 24, 2014.

23 7. Attached as **Exhibit 6** is a true and correct copy of a press release entitled,
24 "Broadcom Introduces First NFC Chips in 40 NM to Drive Next Generation of Mobile Payments
25 and Consumer Electronic Connectivity," dated September 26, 2011, available at
26 <http://www.broadcom.com/press/release.php?id=s608051>, last accessed January 24, 2014.

1 8. On January 27, 2014, I viewed the video at
2 <http://www.youtube.com/watch?v=2n5qSd7ij-k>. It was entitled “Broadcom at CES 2012: NFC
3 Demo with Ron Wong.”

4 9. Attached as **Exhibit 7** is a true and correct copy of a press release entitled,
5 “Broadcom Delivers Advanced Wireless Connectivity to Nintendo’s Wii U Gaming Experience,”
6 dated November 19, 2012, available at <http://www.broadcom.com/press/release.php?id=s722281>,
7 last accessed January 27, 2014.

8 10. On January 27, 2014, I viewed the video at
9 <http://www.youtube.com/watch?v=2KiZ6Cd1j8U>. It was entitled, “Nintendo Wii U Controller
10 Demo from CES 2012.”

11 11. Attached as **Exhibit 8** is a true and correct copy of a webpage entitled, “2012
12 International CES,” available at <http://www.broadcom.com/company/events/ces12.php>, last accessed
13 January 24, 2014.

14 12. Attached as **Exhibit 9** is a true and correct copy of an article posted on a Broadcom
15 blog entitled, “The Road to CES 2013: Are We There Yet?” by Rachel Rosmarin, dated January 7,
16 2013, available at <https://blog.broadcom.com/ces/the-road-to-ces-2013-are-we-there-yet/>, last
17 accessed January 24, 2014.

18 13. Attached as **Exhibit 10** is a true and correct copy of an article posted on a Broadcom
19 blog entitled, “Tech Overdrive: Inside the Broadcom Booth at CES,” by Rachel Rosmarin, dated
20 January 8, 2013, available at [http://blog.broadcom.com/ces/tech-overload-inside-the-broadcom-](http://blog.broadcom.com/ces/tech-overload-inside-the-broadcom-booth-at-ces/)
21 [booth-at-ces/](http://blog.broadcom.com/ces/tech-overload-inside-the-broadcom-booth-at-ces/), last accessed January 24, 2014.

22 14. Attached as **Exhibit 11** is a true and correct copy of a press release entitled,
23 “Broadcom Launches Industry’s First Certified NFC Quad-Combo Wireless Connectivity Solution,”
24 dated December 11, 2012, available at <http://www.broadcom.com/press/release.php?id=s726226>,
25 last accessed January 24, 2014.

26 15. Attached as **Exhibit 12** is a true and correct copy of an article posted on a Broadcom
27 blog entitled, “CES 2014 Starts with a Bang: Broadcom Kicks Off Consumer Electronics Show with
28

1 a Flurry of Announcements,” by Fredric Paul, dated Jan. 6, 2014, available at
2 [http://blog.broadcom.com/ces/ces-2014-starts-with-a-bang-broadcom-kicks-off-consumer-](http://blog.broadcom.com/ces/ces-2014-starts-with-a-bang-broadcom-kicks-off-consumer-electronics-show-with-a-flurry-of-announcements/)
3 [electronics-show-with-a-flurry-of-announcements/](http://blog.broadcom.com/ces/ces-2014-starts-with-a-bang-broadcom-kicks-off-consumer-electronics-show-with-a-flurry-of-announcements/), last accessed January 24, 2014.

4 16. On January 27, 2014, I viewed the video at
5 <http://www.youtube.com/watch?v=jzVUXV1uxj4>. It was entitled, “Broadcom is geared up and
6 ready for 2014.”

7 17. Attached as **Exhibit 13** is a true and correct copy of an article posted on a Broadcom
8 blog entitled, “Futurists’ Playground: A Look Inside Broadcom’s Booth at CES 2014,” by Frederic
9 Paul, dated January 8, 2014, available at [http://blog.broadcom.com/ces/futurists-playground-a-look-](http://blog.broadcom.com/ces/futurists-playground-a-look-inside-broadcoms-booth-at-ces-2014/)
10 [inside-broadcoms-booth-at-ces-2014/](http://blog.broadcom.com/ces/futurists-playground-a-look-inside-broadcoms-booth-at-ces-2014/), last accessed January 24, 2014.

11 18. Attached as **Exhibit 14** is a true and correct copy of the text that displays one the
12 webpage <https://blog.broadcom.com/ces/video-roundup-see-the-blog-squad-in-action-at-ces-2014/>,
13 last accessed January 24, 2014. The webpage is an article posted on a Broadcom blog entitled,
14 “Video Roundup: See the Blog Squad in Action at CES 2014,” by Aaron Schmidt, dated January 10,
15 2014. The pictures which appear on the webpage from which a viewer may click to watch a number
16 of embedded videos do not appear on the exhibit.

17 19. Attached as **Exhibit 15** is a true and correct copy of an article posted on a Broadcom
18 blog entitled, “NFC Ready for Mainstream Adoption with New Combo Chip,” by Mohamed Awad,
19 dated December 11, 2012, available at: [http://blog.broadcom.com/wireless-technology/nfc-ready-](http://blog.broadcom.com/wireless-technology/nfc-ready-for-mainstream-adoption-with-new-combo-chip/)
20 [for-mainstream-adoption-with-new-combo-chip/](http://blog.broadcom.com/wireless-technology/nfc-ready-for-mainstream-adoption-with-new-combo-chip/), last accessed January 24, 2014.

21 20. Attached as **Exhibit 16** is a true and correct copy of a webpage entitled “Broadcom
22 NFC Solutions,” available at <http://www.broadcom.com/products/NFC/NFC-Solutions>, last accessed
23 on January 24, 2014.

24 21. Attached as **Exhibit 17** is a true and correct copy of a document entitled, “Broadcom
25 Corp. Form 10-K (Annual Report),” dated January 30, 2013.

26 22. Attached as **Exhibit 18** is a true and correct copy of a webpage entitled, “Entity
27 Details – Broadcom Corporation,” available at
28

1 <http://nvsos.gov/sosentitysearch/CorpDetails.aspx?lx8nvq=TvKU3IoQUZbXCieHuai%252biw%253d%253d&nt7=0>, last accessed January 27, 2014.

2
3 23. Attached as **Exhibit 19** is a true and correct copy of an article entitled, “Where To
4 File Your Patent Case,” by Mark A. Lemley, AIPLA Quarterly Journal (Fall 2010), available at
5 <http://ssrn.com/abstract=1597919>, last accessed January 24, 2014.

6 24. Attached as **Exhibit 20** is a true and correct copy of an Order regarding the
7 Defendant’s Motion to Transfer Venue, *Unwired Planet LLC v. Google Inc.*, No. 12-00504-MMD-
8 VPC (D. Nev. Aug. 19, 2013), D.I. 135.

9 25. Attached as **Exhibit 21** is a true and correct copy of an Order regarding a Motion to
10 Transfer Venue, *Channell Commercial Corp. v. Preformed Line Products Co.*, No. 13-0002-TJH
11 (SPx) (C.D. Cal. June 18, 2013), D.I. 29.

12 26. Attached as **Exhibit 22** is a true and correct copy of an Order Denying Motion to
13 Change Venue, *The Ipat Group, Inc. v. Scotts Miracle-Gro Co.*, No. 09-02419-GMN-RJJ (D. Nev.
14 Sept. 9, 2010), D.I. 32.

15 27. Attached as **Exhibit 23** is a true and correct copy of an Order re Motion to Transfer,
16 *Continental Appliances, Inc. v. SHM International Corp.*, 11-1544 JVS (C.D. Cal. May 7, 2012),
17 D.I. 58.

18 28. Attached as **Exhibit 24** is a true and correct copy of the Findings and
19 Recommendation regarding Defendant’s Motion to Dismiss, *Vestas-American Wind Technology,*
20 *Inc. v. Beaird Co., Ltd.*, No. 07-1651-PK (D. Or. Aug. 11, 2008), D.I. 56.

21 29. Attached as **Exhibit 25** is a true and correct copy of an In Chambers Order regarding
22 Defendants’ Motion to Transfer Venue, *Imaginal Systematic, LLC v. Leggett & Platt, Inc.*, No. 10-
23 07416-RGK (SSx) (C.D. Cal. Apr. 14, 2011), D.I. 63.

24 30. Attached as **Exhibit 26** is a true and correct copy of an Order Denying Defendant’s
25 Motion to Transfer Venue, *Park v. CAS Enterprises, Inc.*, C.A. No. 08-0385 DMS (NLS) (S.D. Cal.
26 June 9, 2008), D.I. 9.

31. Attached as **Exhibit 27** is a true and correct copy of an Order Denying Motion to Dismiss or Transfer Venue, *Industry Access, Inc. v. Elli Mae, Inc.*, 13-02769 (C.D. Cal. Sept. 18, 2013), D.I. 31.

I declare under penalty of perjury that the foregoing is true and correct. Executed in Redwood City, California on January 27, 2014.



Christina M. Finn